



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

02-OSR-0421

Mr. R. F. Naventi, Project Manager
Bechtel National, Inc.
3000 George Washington Way
Richland, Washington 99352

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 – APPROVAL OF BECHTEL NATIONAL, INC.
(BNI) AUTHORIZATION BASIS CHANGE NOTICE (ABCN) 24590-WTP-ABCN-ESH-
01-021, REVISION 2, "SELECTION OF IMPLEMENTING STANDARD FOR
DOCUMENTATION AND SUBMITTALS"

- References:
1. BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmitted for Approval: Contract Deliverable 'Revised Standards Approval Package' and Associated Authorization Basis Change Notices in Support of the 'SRD Standards Approval Package Submittal'," CCN 026385, dated January 15, 2002.
 2. BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmitted for Approval: Contract Deliverable 'Revised Standards Approval Package Update' and Revision 1 to Associated Authorization Basis Change Notices in Support of the 'SRD Standards Approval Package Submittal'," CCN 028977, dated March 22, 2002.
 3. BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmitted for Approval: Authorization Basis Change Notice 24590-WTP-ABCN-ESH-01-007, Revision 2, 'Selection of Implementing Standard for Management and Organization' and 24590-WTP-ABCN-ESH-01-021, Revision 2, 'Selection of Implementing Standard for Documentation and Submittals'," CCN 035802, dated July 17, 2002.

The U.S. Department of Energy, Office of River Protection (ORP), has reviewed ABCN 24590-WTP-ABCN-ESH-01-021, Revision 0, "Selection of Implementing Standard for Documentation and Submittals," submitted in Reference 1. During ORP's review, several questions were developed and BNI responded to the questions by revising the ABCN in Revision 1 and Revision 2, submitted in Reference 2 and Reference 3, respectively. The additional changes contained in Revision 1 and 2 were also evaluated as part of the review.

In ABCN 24590-WTP-ABCN-ESH-01-021, BNI proposed the following changes to the Safety Requirements Document (SRD):

1. Rewrite Safety Criterion (SC) 9.0-1 regarding air and liquid effluent samples and monitoring data.
2. For SC 9.0-1, replace the implementing standard (of ISMP Section 9.2, "Scheduling of Events for Regulatory Submittals") with "None".
3. For SC 9.0-4, replace the implementing standards (of ISMP, Section 3.3.1, "Content of the Authorization Basis," Section 3.3.2, "Control of the Authorization Basis," and Section 3.3.3, "Changes to Safety Documentation") with proposed SRD Volume II, Appendix G, "Ad Hoc Standard for Safety Analysis Reports," and new proposed ad hoc standard, SRD Volume II, Appendix* [Appendix letter designation not yet assigned], "Ad Hoc Standard for Project Integrated Safety Management Approach."
4. For SC 9.1-4, change "3 months" to "6 months" in the first sentence of the SC and replace the implementing standard (of ISMP Section 3.3.3, "Changes to Safety Documentation") with DOE Guide 421.1-2, *Implementation Guide for Use in Developing Documented Safety Analyses to Meet Subpart B of 10 CFR 830*, Section 4.1-3, "Annual DSA Updates (830.202)," as tailored in SRD Volume II, Appendix C.
5. For SC 9.1-5, replace the implementing standard (of ISMP Chapter 8.0, "Document Control and Maintenance") with 24590-WTP-QAM-QA-01-001, *Quality Assurance Manual* (QAM), Policy Q-06.1, Document Control, and Policy Q-17.1, Quality Assurance Records.
6. For SC 9.1-6, replace the implementing standard (of ISMP 3.2, "Safety Responsibilities") with the new proposed ad hoc standard, SRD Volume II, Appendix*, "Ad Hoc Standard for Project Integrated Safety Management Approach."
7. For SC 9.1-7, replace the implementing standard (of ISMP Chapter 9.0, "Scheduling of Safety Related Activities") with SRD Volume II, Appendix G, "Ad Hoc Standard for Safety Analysis Reports."

Based upon the information in Reference 3 and the enclosed Safety Evaluation Report, the changes are acceptable, and there is reasonable assurance that the health and safety of the public, the workers, and the environment will not be adversely affected by those changes, and that they comply with applicable laws, regulations, and River Protection Project Waste Treatment Plant contractual requirements. The Safety Evaluation Report is attached.

Mr. R. F. Naventi
02-OSR-0421

-3-

As part of the amendment implementation process, please submit within 14 days of receipt of this letter the revised pages of the SRD, identifying all revisions to date. This amendment is effective immediately and shall be fully implemented within 30 days; i.e., the provisions of the amendment may be used immediately; within 30 days, controlled copies of the SRD and subordinate documents must be modified to reflect the changes associated with this amendment.

If you have any questions, please contact me, or your staff may call W. J. Pasciak, Office of Safety Regulation, (509) 373-9189.

Sincerely,

OSR:WJP

Roy J. Schepens
Manager

Attachment

**Safety Evaluation Report (SER)
of Proposed Authorization Basis Change Notice (ABCN)
24590-WTP-ABCN-ESH-01-021, Revision 2
to the Safety Requirements Document (SRD)
for the River Protection Project-Waste Treatment Plant (RPP-WTP)**

1.0 INTRODUCTION

The RPP-WTP authorization basis (AB) is the composite of information provided by Bechtel National, Inc., (the Contractor) in response to radiological, nuclear, and process safety requirements that is the basis on which the Manager, Office of River Protection (ORP) grants permission to perform regulated activities. The AB includes that information requested by the Contractor for inclusion in the AB and subsequently accepted by the ORP. The AB for the RPP-WTP includes the SRD and the Integrated Safety Management Plan (ISMP). The SRD contains the approved set of radiological, nuclear, and process safety standards and requirements, which, if implemented, provide adequate protection of workers, the public, and the environment against the hazards associated with the operation of the facility. The ISMP defines a set of integrated activities that is directed toward the management or control of radiological, nuclear, and process hazards such that adequate protection is provided to workers, the public, and the environment. By letter dated January 15, 2002,¹ the Contractor submitted proposed amendment, ABCN 24590-WTP-ABCN-ESH-01-021, Revision 0, "Selection of Implementing Standard for Documentation and Submittals," to the SRD, and by letters dated March 22, 2002,² and July 17, 2002,³ the amendment was revised. This SER documents the evaluation of the changes proposed by the Contractor.

2.0 BACKGROUND

The SRD contains the set of radiological, nuclear, and process safety standards necessary to ensure adequate protection of the health and safety of workers, co-located workers, the public, and the environment from radiological, nuclear, and process hazards. The SRD standards are developed via an iterative process. Included in the development process is a continuing review of industry practices, particularly those referenced in the SRD, and review of the results of the process hazards and accident analyses as they evolve with the design of the facility for potential impacts on the SRD standards used to ensure protection of workers, the public, and the environment.

¹ BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmitted for Approval: Contract Deliverable 'Revised Standards Approval Package' and Associated Authorization Basis Change Notices in Support of the 'SRD Standards Approval Package Submittal'," CCN 026385, dated January 15, 2002.

² BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmitted for Approval: Contract Deliverable 'Revised Standards Approval Package Update' and Revision 1 to Associated Authorization Basis Change Notices in Support of the 'SRD Standards Approval Package Submittal'," CCN 028977, dated March 22, 2002.

³ BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmitted for Approval: Authorization Basis Change Notice 24590-WTP-ABCN-ESH-01-007, Revision 2, 'Selection of Implementing Standard for Management and Organization,' and 24590-WTP-ABCN-ESH-01-021, Revision 2, 'Selection of Implementing Standard for Documentation and Submittals'," CCN 035802, dated July 17, 2002.

The ISMP documents the processes by which laws, regulations, and standards applicable to the nuclear, radiological, and process safety aspects of the Project are incorporated into programs for facility design, construction, commissioning, operation, and deactivation to ensure adequate safety of workers and the public and protection of the environment. The ISMP also describes how the safety management practices will be followed and further developed during the later phases of the Project.

In ABCN 24590-WTP-ABCN-ESH-01-021, Revision 2, the Contractor has proposed the following:

1. Rewrite Safety Criterion (SC) 9.0-1 regarding air and liquid effluent samples and monitoring data.
2. For SC 9.0-1, replace the implementing standard (of ISMP Section 9.2, "Scheduling of Events for Regulatory Submittals") with "None".
3. For SC 9.0-4, replace the implementing standards (of ISMP, Section 3.3.1, "Content of the Authorization Basis," Section 3.3.2, "Control of the Authorization Basis," and Section 3.3.3, "Changes to Safety Documentation") with proposed SRD Volume II, Appendix G, "Ad Hoc Standard for Safety Analysis Reports," and new proposed ad hoc standard, SRD Volume II, Appendix* [Appendix letter designation not yet assigned], "Ad Hoc Standard for Project Integrated Safety Management Approach."
4. For SC 9.1-4, change "3 months" to "6 months" in the first sentence of the SC and replace the implementing standard (of ISMP Section 3.3.3, "Changes to Safety Documentation") with DOE Guide 421.1-2, *Implementation Guide for Use in Developing Documented Safety Analyses to Meet Subpart B of 10 CFR 830*, Section 4.1-3, "Annual DSA Updates (830.202)," as tailored in SRD Volume II, Appendix C.
5. For SC 9.1-5, replace the implementing standard (of ISMP Chapter 8.0, "Document Control and Maintenance") with 24590-WTP-QAM-QA-01-001, *Quality Assurance Manual* (QAM), Policy Q-06.1, Document Control, and Policy Q-17.1, Quality Assurance Records.
6. For SC 9.1-6, replace the implementing standard (of ISMP Section 3.2, "Safety Responsibilities") with the new proposed ad hoc standard, SRD Volume II, Appendix *⁴, "Ad Hoc Standard for Project Integrated Safety Management Approach."
7. For SC 9.1-7, replace the implementing standard (of ISMP Chapter 9.0, "Scheduling of Safety Related Activities") with SRD Volume II, Appendix G, "Ad Hoc Standard for Safety Analysis Reports."

⁴ The Appendix letter designation has not been assigned.

3.0 EVALUATION

3.1 24590-WTP-ABCN-ESH-01-021, Revision 2

3.1.1 Proposed Changes to SC 9.0-1

The presently approved criterion and implementing codes and standards are:

“An annual report shall be prepared and submitted to the Regulator and appropriate local officials. The annual report shall document:

- (1) the quantity of each of the principal radionuclides in excess of background released to unrestricted areas in liquid and gaseous effluents during the previous year of operation.
- (2) the calculated annual dose to the maximally exposed members of the public, and
- (3) the calculated collective dose to members of the public from exposures to RPP-WTP radiation sources.

Reports on dose estimates to the public shall include relevant site-specific information, including the locations of members of the public subject to the greatest potential exposures, the population distribution subject to exposures from RPP-WTP activities, and exposure pathways germane to the site. Values of assumed default or site-specific parameters used in calculations shall be discussed and included with the documentation of the calculations.

Implementing Codes and Standards

24590-WTP-ISMP-ESH-01-001, *Integrated Safety Management Plan*
Section 9.2, ‘Scheduling of Events for Regulatory Submittals’”

The proposed new criterion is:

“Air and liquid effluent samples and monitoring data required by state and federal regulations and permits shall be collected. The monitoring and sampling data shall include the quantity of each of the principal radionuclides in excess of background released to unrestricted areas in liquid and gaseous effluents during the previous year of operation. Appropriate data and analyses shall be submitted to the appropriate Hanford Site contractor in a timely manner and include relevant site-specific information, including the locations of members of the public subject to the greatest potential exposures, the population distribution subject to exposures from RPP-WTP activities, and exposure pathways germane to the site. This data shall be used to prepare the mandatory state and federal environmental reports using approved EPA [Environmental Protection Agency] computer codes.”

The proposed new criterion does not have any implementing codes or standards.

Evaluation: (Acceptable)

The current text in SRD SC 9.0-1 requires annual reporting of air and liquid effluent samples and monitoring data in accordance with state and federal regulations. There is no requirement in ORP's top-level standards to perform annual reporting of environmental monitoring data and no record could be found indicating that annual reporting is necessary for ORP to effectively oversee the Contractor. Therefore, to determine the appropriate set of environmental reporting requirements, ORP must refer to applicable and relevant Contract language, which is found in Standard 7: Environment, Safety, Quality, and Health.

One of the requirements of Standard 7, found in Section (e)(4), "Environmental Protection," is item (iv):

"The Contractor shall implement a program to track and address environmental compliance issues and implement and comply with all requirements (including, but not limited to, permitting, environmental reports, enforcement actions, consent decrees, *Hanford Federal Facility Agreement and Consent Order* milestones/reports/management commitments, NEPA, pollution prevention, and waste minimization)."

Further, Section C.9 of the Contract, Interface Control Documents (ICDs), requires a formal system of interface management to ensure documentation and management of shared responsibilities. For air emissions, those shared responsibilities and expectations are outlined in BNFL-5193-ID-22, Rev. 4.0, *Interface Control Document for Air Emissions*. As discussed in the ICDs, only one compliance submittal for all of the Hanford Site is expected to be prepared and delivered. Further, the ICD does not require annual reporting but rather indicates that reporting shall satisfy all regulatory requirements (i.e., not just annual if other reporting is required) and that the Contractor's input shall be coordinated with the Hanford Site report for both the state and DOE. Thus, it is clear that separate or additional reporting requirements for the WTP that would duplicate other ORP or RL reporting are not expected.

It is acceptable to delete the implementing code and standard on reporting since reporting obligations are defined by each regulation, which are part of overall regulatory compliance, as required by the contract. Additional Hanford reporting is coordinated through the Interface Control Document process, which would not require a separate implementing code and standard.

The reviewers concluded that the proposed change to SRD SC 9.0-1 is not a reduction in commitment or effectiveness, and is consistent with the Contract requirements. Therefore, the proposed revision is acceptable.

3.1.2 Proposed Changes to SC 9.0-4

Description of Change:

The presently approved criterion and implementing codes and standards are:

“Material that is part of the authorization basis shall be established, documented, and submitted to the DOE for evaluation and in support of decisions and regulatory oversight. The material shall be maintained current with respect to changes made to the facility design and administrative controls and in the light of significantly new safety information.

Implementing Codes and Standards

24590-WTP-ISMP-ESH-01-001, *Integrated Safety Management Plan*

Section 3.3.1, ‘Content of the Authorization Basis’

Section 3.3.2, ‘Control of the Authorization Basis’

Section 3.3.3, ‘Changes to Safety Documentation’”

As shown on page 2 of 5 of Attachment 1 of ABCN-ESH-01-021, revision 2, BNI proposes to replace the implementing standard:

24590-WTP-ISMP-ESH-01-001, *Integrated Safety Management Plan*, Section 3.3.1, "Content of the Authorization Basis," Section 3.3.2, "Control of the Authorization Basis," and Section 3.3.3, "Changes to Safety Documentation"

with the new implementing standard: 24590-WTP-SRD-ESH-01-001-02, *Safety Requirements Document, Volume II*, Appendix G, "Ad Hoc Implementing Standard for Safety Analysis Reports."

By contrast, Section 3.2, "Results of ISM Team Standards Selection Process" (page 6 of 12) of Attachment 2, "Identification of Implementing Standards for the WTP Project Documentation and Submittals," proposes the following as implementing standards for SC 9.0-4:

"For SC 9.0-4 - proposed ad hoc implementing standard, SRD Volume II, Appendix*, *Ad Hoc Implementing Standard for Safety Analysis Reports*. (See ABCN-24590-WTP-00004, Revision 2) and new proposed ad hoc implementing standard, SRD Volume II, Appendix* - *Ad Hoc Implementing Standard for Project Integrated Safety Management Approach* (See ABCN 24590-WTP-ABCN-ESH-01-007, Revision 2)."

Because the remainder of Attachment 2 and the ABCN consistently refers to the two ad hoc standards cited in the paragraph above as the implementing standard for SC 9.0-4, it was verified through staff discussions that the markup of the SC on page 2 of 5 of Attachment 1 is incorrect and reflects an editorial error.

Evaluation: (Acceptable)

Attachment 2, "Identification of Implementing Standards for the WTP Project Documentation and Submittals," states on page 9 of 12 of its evaluation that

"The new proposed ad hoc implementing standard, Appendix*, *Ad Hoc Implementing Standard for Safety Analysis Reports* and SRD Volume II, Appendix* - *Ad Hoc Implementing Standard for Project Integrated Safety Management Approach* is used as the guidance document for development of the SAR and other AB documentation and provides the necessary guidance for establishing, documenting and submittal of authorization basis material to DOE per safety criteria 9.1-1 through 9.1-3 and is the appropriate implementing standard for Safety Criterion 9.0-4."

The proposed standards provide direction for developing, establishing, documenting, maintaining, and submitting AB material to DOE. Although the proposed ad hoc implementing standards do not contain all of the program description of the ISMP sections currently used as the implementing standards, they do agree with, and adequately reflect, the commitments in the ISMP. A comparison of ISMP Sections 3.3.1, "Content of the Authorization Basis," Section 3.3.2, "Control of the Authorization Basis," and Section 3.3.3, "Changes to Safety Documentation," with the proposed new implementing standards indicates that summaries of these ISMP sections are included in the proposed ad hoc implementing standards, and there is no reduction in commitment for this proposed change to SC 9.0-4. Therefore, the proposed changes to SC 9.0-4 are acceptable.

3.1.3 Proposed Changes to SC 9.1-4

Description of Change:

The presently approved criterion and implementing codes and standards are:

"The FSAR shall be reviewed annually and updated as necessary to ensure that the information is current, remains applicable, and reflects all changes implemented up to 3 months prior to the filing of the updated FSAR. The regulatory approval of any Unreviewed Safety Questions, and the material submitted to the regulator in support of that approval, shall be considered an addendum to the FSAR until the information is incorporated into the FSAR as part of the next periodic update.

Implementing Codes and Standards

24590-WTP-ISMP-ESH-01-001, *Integrated Safety Management Plan*
Section 3.3.3, 'Changes to Safety Documentation'"

BNI proposes to change "3 months" to "6 months" in the first sentence of the SC and replace the implementing standard (of ISMP Section 3.3.3, "Changes to Safety Documentation") with DOE G 421.1-2, *Implementation Guide for Use in Developing Documented Safety Analyses to Meet*

Subpart B of 10 CFR 830, Section 4.1-3, "Annual DSA Updates (830.202)," as tailored in SRD Volume II, Appendix C.

Evaluation: (Acceptable)

10 CFR 830.202, "Safety Basis," paragraphs (c)(1) and (c)(2) require the Contractor to:

"Update the safety basis to keep it current and to reflect changes in the facility, the work and the hazards as they are analyzed in the documented safety analysis;

Annually submit to DOE either the updated documented safety analysis for approval or a letter stating that there have been no changes in the documented safety analysis since the prior submission."

DOE G 421.1-2 describes DOE-suggested approaches for meeting the documented safety (DSA) analysis development process provisions of 10 CFR 830. The information contained in the Guide is intended for use by all Department elements, and all contractors for a DOE-owned or DOE-leased Hazard Category 1, 2, or 3 nuclear facility or nuclear operation. DOE G 421.1-2 Section 4.1.3, "Annual DSA Updates (830.202)," reiterates that Contractors must ensure that information in a DSA is current and applicable. The Guide acknowledges that it may be impractical to incorporate the most recent facility changes into the annual update. However, the Guide recommends that at least those implemented six months or more before the submittal of the annual update should be included.

BNI's proposed changes reflect the DOE-suggested approach for the FSAR to reflect all changes implemented up to 6 months prior to filing of the updated FSAR. This change proposes to reduce the current commitment to include changes implemented 3 months prior to filing of the updated FSAR. The 6-month commitment is consistent with the guidance in DOE G 421.1-2, Section 4.1.3.

Except for the 3-month to 6-month change, the proposed changes in the selected standard do not reduce the programmatic requirements contained in the Contract or the authorization basis. The current ISMP requirements are unchanged and remain. The proposed changes to the SC 9.1-4 do not affect the SRD or ISMP approach to provide adequate safety for documentation and submittals and the development and control of safety analysis reports (SARs). Using Section 4.1.3 of DOE G 421.1-2 as the implementing standard for SC 9.1-4 conforms with the DOE-suggested approach for complying with 10 CFR 830, Subpart B, *Safety Basis Requirements*. Therefore, the proposed changes to SC 9.1-4 are acceptable.

3.1.4 Proposed Changes to SC 9.1-5

Description of Change:

The presently approved criterion and implementing codes and standards are:

“The SAR shall be maintained as a controlled document.

Implementing Codes and Standards

24590-WTP-ISMP-ESH-01-001, *Integrated Safety Management Plan*
Chapter 8.0, ‘Document Control and Maintenance’”

BNI proposes to replace the implementing standard (of ISMP Chapter 8.0, "Document Control and Maintenance") with 24590-WTP-QAM-QA-01-001, *QAM* Policy Q-06.1, Document Control, and Policy Q-17.1, Quality Assurance Records.

Evaluation: (Acceptable)

The current implementing standard, ISMP Chapter 8.0, "Document Control and Maintenance," refers to the QAM requirements in Section 6, “Document Control”, and Section 17, “QA Records,” for maintaining the SAR. Replacing the current implementing standard with direct references to the applicable sections of the QAM removes a level of referencing, is consistent with the ISMP, and is not a reduction in commitment. Therefore, the proposed change to SC 9.1-5 is acceptable.

3.1.5 Proposed Change to SC 9.1-6:

Description of Change:

The presently approved criterion and implementing codes and standards are:

“All responsibilities concerning the facility as identified in the approved SAR shall be carried out.

Implementing Codes and Standards

24590-WTP-ISMP-ESH-01-001, *Integrated Safety Management Plan*
Section 3.2, ‘Safety Responsibilities’”

As shown on page 4 of 5 of Attachment 1 of ABCN-ESH-01-021, Revision 2, BNI proposes to replace the implementing standard 24590-WTP-ISMP-ESH-01-001, ISMP, Section 3.2, Safety Responsibilities, with the new implementing standard: 24590-WTP-SRD-ESH-01-001-02, *Safety Requirements Document, Volume II*, Appendix*, "Ad Hoc Implementing Standard for Project Integrated Safety Management Approach."

Pages 10 of 12 and 11 of 12 of Attachment 2, "Identification of Implementing Standards for the WTP Project Documentation and Submittals," state:

"Section 1.0 and 6.0 of the new proposed ad hoc standard, SRD Volume II, Appendix * - *Ad Hoc Implementing Standard for Project Integrated Safety Management Approach* contain specific requirements for documenting the organizational structure, functional responsibilities, levels of authority, and interfaces for those managing, performing and assessing the work. The QAM provides the details of the QA Program. Policy Q-01.1 of the QAM details the

assignments of the roles and responsibilities for project management and will be maintained throughout the project life. This requirement will ensure that Safety Criterion 9.1-6 remains implemented on the Project."

However, the conclusions of Attachment 2 (page 11 of 12) state:

"Further the ISM Team determined that DOE G 421.1-2, as tailored in SRD Volume II, Appendix C and the Quality Assurance Manual ASME-NQA-1-1989 provide adequate and appropriate implementing standards for Safety Criterion 9.1-4 and Safety Criteria 9.1-5 and **9.1-6** [emphasis added] respectively."

The OSR verified through staff discussions that the reference to SC 9.1-6 was an editorial error because DOE G 421.1-2 and ASME-NQA-1-1989 were not proposed as implementing standards for SC 9.1-6 elsewhere in the ABCN.

Evaluation: (Acceptable)

Pages 8 of 10 and 9 of 10 of Attachment 3 (see the table entitled "SRD Proposed Changes Summary/Safety Evaluation") provide the basis and rationale for the proposed implementing standard and state:

"Section 1.0 and 6.0 of the new proposed implementing standard, SRD Volume II, Appendix *, Ad Hoc Implementing Standard for Project Integrated Safety Management Approach contain specific requirements for documenting the organizational structure, functional responsibilities, levels of authority, and interfaces for those managing, performing and assessing the work. The QAM provides the details of the QA Program. Policy Q-01.1 of the QAM details the assignments of the roles and responsibilities for project management and will be maintained throughout the project life. This requirement will ensure that Safety Criterion 9.1-6 remains implemented on the project."

OSR notes that Section 2.0, "Safety Responsibilities," also pertains to SC 9.1-6. The SRD SC itself and the ISMP are not proposed to be changed. The commitments in the ISMP remain. Although the proposed ad hoc implementing standard does not contain all of the program description of the ISMP section currently used as the implementing standard, it does agree with, and adequately reflects, the commitments in the ISMP. Both the ISMP and the proposed ad hoc implementing standard state that safety responsibilities are assigned to and by the WTP Project Manager, and that, by these assignments, assurance is provided that the roles identified in the WTP Project SAR are carried out. Furthermore, Section 6.0 states: "Overall project roles, responsibilities, and authorities are provided in 24590-WTP-QAM-01-001, Quality Assurance Manual." A comparison of ISMP Section 3.2 with Sections 1.0, 2.0, and 6.0 of the proposed new implementing standard indicates that the proposed standard is consistent with the remainder of the AB, and there is no reduction in commitment for this proposed change to the SRD. Therefore, the proposed revisions of SC 9.1-6 are acceptable.

3.1.6 Proposed Changes to SC 9.1-7

Description of Change:

The presently approved criterion and implementing codes and standards are:

“The hazard analysis shall be submitted for approval as part of the SAR.
Implementing Codes and Standards
24590-WTP-ISMP-ESH-01-001, *Integrated Safety Management Plan*
Chapter 9.0, ‘Scheduling of Safety-Related Activities’”

BNI proposes to replace the implementing standard (of ISMP Chapter 9.0, "Scheduling of Safety Related Activities") with SRD Volume II, Appendix G, "Ad Hoc Standard for Safety Analysis Reports."

Evaluation: (Acceptable)

The change in the selected standard does not reduce the programmatic requirements contained in the Contract or the authorization basis. The proposed change to SC 9.1-7 does not affect the SRD requirements for development and control of hazard analysis reports. Commitments in the ISMP are not changed. Moreover, the proposed ad hoc implementing standard, Appendix G, "Ad Hoc Standard for Safety Analysis Reports," specifically identifies the hazard analysis as part of the SAR, which is not the case for ISMP Chapter 9.0. Therefore, the proposed change to SC 9.1-7 is acceptable.

4.0 CONCLUSION

On the basis of the considerations described above, ORP has concluded there is reasonable assurance that the health and safety of the public and the workers will not be adversely affected by the proposed changes. The proposed changes to the SRD do not constitute a reduction in commitment or effectiveness. ABCN 24590-WTP-ABCN-ESH-01-021, Revision 2, is approved.